

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division**

**CHARLENE CARTER,**

**Plaintiff,**

**v.**

**SOUTHWEST AIRLINES CO., AND  
TRANSPORT WORKERS UNION OF  
AMERICA,  
LOCAL 556,**

**Defendants.**

**Civil Case No. 3:17-cv-02278-X**

**DEFENDANT SOUTHWEST AIRLINES CO.'S SHOW-CAUSE  
NOTIFICATION PLEADING**

Defendant Southwest Airlines Co. ("Southwest"), pursuant to the Court's order of April 10, 2023 ("Show-Cause Order"), files this notice of identification of parties involved in the crafting or approval of Flight Attendant notifications and notice of production of documents, and, in connection therewith would show as follows:

**I. IDENTIFICATION OF INDIVIDUALS**

The following individuals were involved in the crafting or authorization of the "Recent Court Decision" notice and/or the "Inflight On the Go Memorandum," as those documents are described in the Show-Cause Order:

- Paulo McKeeby, outside counsel;
- Chris Maberry, attorney in Southwest Airlines' in-house legal department;
- Kerrie Forbes, attorney in Southwest Airlines' in-house legal department;
- Kevin Minchey, attorney in Southwest Airlines' in-house legal department;
- Brandy King, Managing Director of Public Relations for Southwest Airlines;
- Mike Sims, Managing Director of Inflight Crew Support & Services for Southwest Airlines;

- Rachel Loudermilk, Managing Director of Inflight Base Operations & Employee Engagement for Southwest Airlines;
- Meggan Jones, Senior Manager of Labor Administration in Southwest Airlines' in-house legal department;
- Cindy Hermosillo, Communications Advisor for Southwest Airlines;
- Melissa Ford, Director of Operations and Labor Communications for Southwest Airlines;
- Sonya Lacore, Vice President of Inflight for Southwest Airlines.

## **II. NOTICE REGARDING DOCUMENT PRODUCTION**

Southwest also respectfully advises the Court that Southwest, contemporaneous with the filing of this pleading, is also producing to counsel for Plaintiff documents and privilege logs contemplated by the Court's Show Cause Order. Southwest would note that its inside and outside counsel were significantly involved in the drafting and review of the "Recent Court Decision" notice and the "Inflight On the Go Memorandum." As such, most of the email communications related to the preparation of those documents, as well as the drafting of the documents, are privileged as reflected in the privilege log being produced to Plaintiff's counsel.

Dated: April 28, 2023

Respectfully submitted,

/s/ Paulo B. McKeeby

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**ATTORNEYS FOR DEFENDANT  
SOUTHWEST AIRLINES CO.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been filed via the Court's ECF system and all counsel of record have been served on this 28<sup>th</sup> day of April, 2023.

/s/ Paulo B. McKeeby

Paulo B. McKeeby